



Shipyard Stewardship Program

History & Overview

Sector Strategies Program

History



- Program started in 1998 as EPA's Sustainable Industries Program.
- Designed as a cooperative partnership between government (EPA), trade groups and other stakeholders to reduce pollution and ease the burden of regulation.
- The program establishes partnerships with industry sectors via trade organizations. Shipbuilding was a founding industry sector.

Sector Strategies Program

History

- In 2003 EPA revamped the program; renaming it the Sector Strategies program (SSP).
 - At that time EPA asked the existing 11 industry sectors to re-commit to the Program.
 - Both the American Shipbuilding Association and the Shipbuilder's Council of America re-committed to EPA.

Sector Strategies Program

History

- The three primary goals of the program are to:
 - Overcome barriers to environmental improvement;
 - Promote the use of Environmental Management Systems; and
 - Measure performance.

Sector Strategies Program History



- What industry gets out of the partnership is:
 - a POC at EPA and;
 - commitment to look at policy issues that are barriers to improved environmental performance.
- What EPA gets is:
 - the opportunity to leverage an entire sector for environmental performance beyond basic regulatory compliance.

Sector Strategies Program

History



- Agribusiness
- Metal Casting
- Cement Manufacturing
- Metal Finishing
- Chemical Manufacturing
- Oil and Gas
- Colleges and Universities
- Paint and Coatings
- Construction
- Ports
- Forest Products
- Shipbuilding and Ship Repair
- Iron and Steel



Sector Strategies Shipbuilding Sector Projects

- 2001 – 2002: Shipbuilding and Ship Repair Environmental Management System Pilot Project –
 - Several shipyards participated in this project.
- 2003: EPA developed an EMS Development Guide for other shipyards to utilize based on the Pilot.
- 2003 – 2004: Sector Strategies worked with EPA Regions 4 and 6, Gulf state environmental agencies, and area shipyards to review and, where appropriate, upgrade BMPs for shipyard stormwater management.



Sector Strategies Shipbuilding Sector Projects

- 2004: Lean Production and Environmental Management Report
 - the report focused on the relationship between Lean and environmental management and ways to leverage the relationship for increased performance.
- 2006 – Present: The Sector Strategies POC has been participating and assisting shipyards working with the Office of Air on the Residual Risk Rule.
 - The SSP POC assisted with removing barriers and making EPA personnel available to the yards to address concerns and issues.



Recent History (2006-2007)

- Meaningful participation from shipyards dropped significantly during this period.
 - EPA tried to solicit information from shipyards to include in the annual Sector Strategies Report.
 - EPA has published publicly available data on hazardous waste and toxic releases.
 - They continually requested that we develop a set of metrics to help gauge our success.
 - EPA solicited the shipyards on what type of project or initiative they would like to work on next.



Recent History (2006-2007)

- The SSP is required to demonstrate to senior managers at EPA that their financial and time commitments are resulting in benefits.
- Due to the lack of response from our Industry EPA zero-funded the shipbuilding sector in the 2006 budget.



March 2007

- In March 2007, EPA requested a conference call with the shipyards and trade organizations.
- During that meeting, SSP Director, Bob Benson, explained that EPA was currently in their work planning phase for the next fiscal year and that EPA was concerned that for the second consecutive year our Sector had no project on the docket.
- Perhaps shipyards were no longer interested in the partnership



March 2007

- During the call Mr. Benson reviewed projects being worked by other sectors.
- He closed the meeting by asking shipyards to go back and meet within our respective trade groups and decide if SSP was still something we were interested in and if so what we would like to work on.
- He was clear that it was a voluntary program and there were no repercussions to exiting the program.



April 2007

- In April 2007, ASA organized a conference call with the 6 ASA Environmental Managers to discuss the issue.
- During the call the environmental managers concluded that there was value in having the relationship with EPA and that some of the past projects had been beneficial.
- During the ASA telecon possible projects were discussed.
- One possible project discussed was establishing a “stewardship program” for shipyards.
 - This was based on similar programs that other Sector’s had completed.



May 2007

- The project concept was presented to EPA in a May conference call and was well received.
- EPA and shipyards agreed to move forward.
- Sub-groups were formed to work on details of the first 4 elements
- EPA provided resources for Ross & Associates to assist with Program Development.
- Monthly telecons



Shipyard Stewardship Program

Program Concept



Program Objective

- To promote continuous improvement in environmental and business performance in the shipbuilding and ship repair industry



Program Concept

- Tiered- approach administered via the 2 Trade organizations (NSRP and/or NAVSEA role TBD)
- Provides a progression for shipyards to follow
- Establish the gold standard elements of a high performance shipbuilding environmental program
- Required performance reporting via trade organizations, trade organizations to report aggregate results



Program Concept

- Establishes gold standard BMP's for the Industry for most high risk environmental aspects
- Requires official application (possible EPA assistance with screening process, etc.?)
- Some form of recognition for participants from EPA along with program endorsement
- Trade organizations promote participation among members



Bronze Site (entry level)

- Compliance
 - Need to define entry-level
 - Look at EPA PT guidelines
- EMS
 - Commitment to implement a 3rd party certified EMS within 3(?) years
 - Can EPA help with 3rd party certifications?
- Performance Measurement
 - Commitment to submit performance metrics to Trade Organization – actual metrics TBD
- BMP's
 - Commitment to implement a minimum number (2?) of gold standard BMP's within 3(?) years
- Continuous Improvement
 - Commitment to 1 beyond compliance goal (possibly related to the metrics? Or WG to establish areas for goals? Follow PT guidelines?)



Silver Site

- Compliance
 - Need to define silver-level
 - Look at EPA PT guidelines
- EMS
 - Implementation of a 3rd party certified EMS
 - Can EPA help with 3rd party certifications?
- Performance Measurement
 - Commitment to submit performance metrics to Trade Organization – actual metrics TBD



Silver Site (Continued)

- BMP's
 - Commitment to implement a minimum number (4?) of gold standard BMP's
- Continuous Improvement
 - Commitment to 2 beyond compliance goal (possibly related to the metrics? Or WG to establish areas for goals? Follow PT guidelines?)
- Demonstrated Past performance
 - Demonstrated environmental performance in at least 1 area
- Mentoring
 - Commitment to mentor Bronze sites (as requested)



Gold Site

- Compliance
 - Meets EPA Performance Track requirements
- EMS
 - Implementation of a 3rd party certified EMS
 - Can EPA help with 3rd party certifications?
- Performance Measurement
 - Commitment to submit performance metrics to Trade Organization – actual metrics TBD
- BMP's
 - Commitment to implement a minimum number (6?) of gold standard BMP's



Gold Site (Continued)

- Continuous Improvement
 - Commitment to 4 beyond compliance goal (possibly related to the metrics? Or WG to establish areas for goals? Follow PT guidelines?)
- Demonstrated Past performance
 - Demonstrated environmental performance in at least 2 environmental aspects
- Mentoring
 - Commitment to mentor Silver sites (as requested)
- Public Outreach
 - Follow EPA PT guidelines
 - Informing community on environmental matters
 - Reporting on EMS and performance commitments

A Model for Improvement

Gold

Silver

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